

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
Plaintiff )

v. )

Civil No.: 25-CV-XXXX-XXX

7.23918814 BTC AND OTHER VARIOUS )  
CRYPTOCURRENCY SEIZED FROM )  
BINANCE ACCOUNT ASSOCIATED )  
WITH USER ID XXXXX3280 ON )  
OCTOBER 25, 2024 )  
Defendant *in Rem*. )

**WARRANT AND MONITION**

To: The United States Secret Service

You Are Hereby Commanded to give notice to all persons concerned that a Verified Complaint for Forfeiture *in Rem* (the “Complaint”), a copy of which is attached hereto, has been filed by the United States of America against the following defendant property, described as:

- a. 7.23918814 BTC, 105.75351403 ETH, 636.11899592 AVAX, 14120.995091 USDT, 2,380,467,906.17 SHIB, and 319008151.01 PEPE seized from a Binance account associated with User ID XXXXX3280, on October 25, 2024 (collectively, the “Defendant Property”).

This Court has found probable cause for forfeiture of the Defendant Property. Accordingly, you are hereby directed to serve, and give notice of the Complaint by:

- (1) Publishing notice of the United States’ intent to forfeit the Defendant Property via the government website, [www.forfeiture.gov](http://www.forfeiture.gov), for thirty (30) consecutive calendar days; and
- (2) Serving a copy of this Warrant and Monition, together with a copy of the Complaint to:

Victim-1  
Newton, MA

Avwerosuo Omokri  
[johnrichie513@gmail.com](mailto:johnrichie513@gmail.com)

Binance Capital Management Co., Ltd.  
c/o Nest Services Limited  
House of Francis, Room 303,

Ile Du Port, Mahe, Seychelles

by certified mail, postage prepaid and return receipt requested, or by serving such copies on the above-listed parties by hand, or by any other reasonable means, such as electronic service.

You Are Further Commanded to arrest, attach, inspect, and retain the Defendant Property in your custody until further order of this Court.

You Are Further Commanded to give due notice by appropriate service of process, as provided herein, to all persons who claim an interest of the Defendant Property or assert that the Defendant Property should not be condemned or disposed of pursuant to the prayer of the Complaint. Upon execution of this process, you are directed further to file the execution in this Court with your return thereon.

ALL CLAIMS TO THE DEFENDANT PROPERTY MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN SIXTY (60) DAYS AFTER THE FIRST DAY OF PUBLICATION ON THE OFFICIAL GOVERNMENT FORFEITURE WEBSITE OR WITHIN THIRTY-FIVE (35) DAYS AFTER RECEIPT OF ACTUAL NOTICE, WHICHEVER IS EARLIER. ALL ANSWERS TO THE COMPLAINT MUST BE FILED WITH THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS AND SERVED UPON ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210, WITHIN TWENTY-ONE (21) DAYS AFTER THE FILING OF THE CLAIM. CLAIMS MUST BE

FILED IN ACCORDANCE WITH THE FEDERAL RULES OF CIVIL PROCEDURE, SUPPLEMENTAL RULES FOR ADMIRALTY OR MARITIME AND ASSET FORFEITURE CLAIMS.

THE PROCEDURES FOR FILING A PETITION FOR REMISSION OR MITIGATION ARE SET FORTH IN 28 CODE OF FEDERAL REGULATIONS, PART 9. IN ADDITION TO THE PROCEDURES MANDATED BY THOSE REGULATIONS, A COPY OF ANY PETITION FOR REMISSION OR MITIGATION SHOULD BE ADDRESSED TO THE ATTORNEY GENERAL; SHALL BE SWORN TO BY THE PETITIONER, OR BY THE PETITIONER'S ATTORNEY UPON INFORMATION BELIEF, SUPPORTED BY THE CLIENT'S SWORN NOTICE OF REPRESENTATION PURSUANT TO 28 U.S.C. § 1746, AS SET FORTH IN 28 C.F.R. § 9.9(g); AND SHOULD BE SUBMITTED TO THE ATTENTION OF ASSISTANT UNITED STATES ATTORNEY CAROL E. HEAD, UNITED STATES ATTORNEY'S OFFICE, ASSET RECOVERY UNIT, 1 COURTHOUSE WAY, SUITE 9200, BOSTON, MASSACHUSETTS 02210.

Robert M. Farrell, Clerk  
U.S. District Court

By: \_\_\_\_\_  
Deputy Clerk

Date: \_\_\_\_\_, 2025

APPROVED AND SO ORDERED:

\_\_\_\_\_  
United States District Judge

Date: \_\_\_\_\_, 2025